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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 2:22-mj-00864-NJK
vs.)	
)	STIPULATION TO CONTINUE
LOUIS RODRIGUEZ)	PRELIMINARY EXAMINATION DATE
)	
)	(THIRD REQUEST)
Defendants.)	
_____)	

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for Louis Daniel Rodriguez, that the Preliminary Examination hearing currently scheduled for January 3rd 2024 at 4:00 p.m., be vacated and set to a date and time convenient to this court but no sooner than sixty (60) days.

The Stipulation is entered into for the following reasons:

1. The parties require additional time to continue negotiations for a Pre-Indictment plea. The parties anticipate this request will be the final pre-indictment request for a continuance in this case.

2. Counsel for Rodriguez has just recently been appointed under the Criminal Justice Act and will require an additional 60 days to finalize pre-indictment matters.

3. Mr. Rodriguez is out of custody and agrees to the continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

6. Denial of this request for continuance would result in a miscarriage of justice.

7. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the Third request for a continuance of the preliminary hearing date in this case.

DATED this 14th day of December 2023.

GABRIEL L. GRASSO, P.C.

JASON M. FRIERSON
United States Attorney

By /s/ Gabriel L. Grasso
GABRIEL L. GRASSO, ESQ.
Counsel for Louis Daniel Rodriguez

By /s/ Edward G. Veronda
EDWARD G. VERDONA
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
LOUIS RODRIGUEZ,)
)
Defendants.)
_____)

Case No.: 2:20-mj-00864-NJK

ORDER

Based on the Stipulation of counsel, and good cause appearing
IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently
scheduled for January 3, 2024, at 4:00 p.m., be vacated and continued to
March 4, 2024.

DATED this 14th day of December, 2023.


UNITED STATES MAGISTRATE JUDGE